

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF OHIO
WESTERN DIVISION

BARBARA LODER HILDEBRANDT,

Plaintiff,

vs.

HYATT CORPORATION

and

TY HELMS

and

BRIAN J. BOOTH,

Defendants.

Case No. C-1-02-0003

Judge Beckwith
Magistrate Judge Sherman

AFFIDAVIT OF ERIC CHARLSON

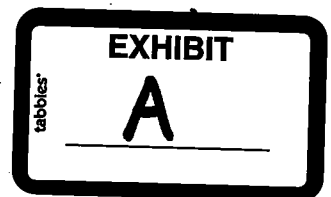
STATE OF INDIANA }

COUNTY OF LAKE }

ss:

BEFORE ME, the undersigned authority, personally appeared, ERIC CHARLSON, who, after first being duly sworn, deposes and states that he is an adult person, over 18 years of age, competent to testify as to the following matters as to which he has personal knowledge or which he believes to be true:

1. I have been employed with Hyatt for over 5 years. I am currently the Human Resources Director for Hyatt. I have held this position since April 2002. My duties include overseeing all of the human resource functions for the corporate offices. In my capacity as



human resources personnel, I am familiar with Hyatt's corporate structure and the Plaintiff's file in this case, BARBARA LODER HILDEBRANDT ("Ms. Hildebrandt").

2. Hyatt employees approximately 45,000 persons Company-wide and operates 122 hotels. Of these 45,000 individuals, Hyatt has approximately 5,200 management level employees.

3. Hyatt hired Ms. Hildebrandt on or about October 1, 1979, as a Sales Manager at the Hyatt Regency Phoenix. Throughout her career, Ms. Hildebrandt received several promotions. In August 1983, Ms. Hildebrandt worked in the same capacity at the Hyatt Regency Tampa. In April 1984, she moved to the Hyatt Regency Savannah in the position of Director of Sales. In June 1986, she moved again, this time to the Hyatt Regency Cincinnati in the same capacity.

4. On or about February 1, 1996, Ms Hildebrandt was promoted to a Director of National Accounts position in the National Sales Force.

5. A primary role of the National Sales Force, which is separate and distinct from the hotels "in the field," is to sell hospitality services to large companies or groups who do business in multiple cities.

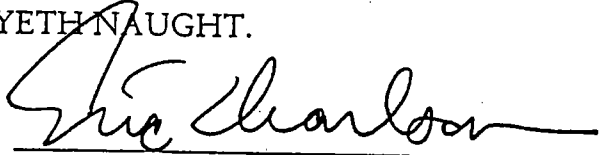
6. Hyatt's National Sales Force is a division of the Corporate Office, and is overseen by Jack Horne, the Assistant Vice President of National Sales. Mr. Horne's direct supervisor is Ty Helms, The Vice President of Sales, in the Corporate Office.

7. Hyatt promoted Mark Henry to fill the position of Associate Director of Sales for the Central Region, in or about December 15, 1999. Bruce Small was the decision-maker with respect to this position.

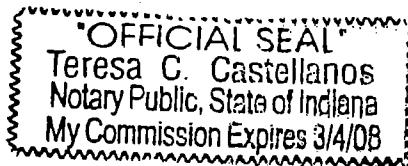
8. Rob Sarmiento was promoted to fill the position of Assistant Vice President for International and Individual Travel on April 10, 2000.

9. Brian Booth received the position of Director of Sales for the Central Region, in or about December 2000.

FURTHER AFFIANT SAYETH NAUGHT.


ERIC CHARLSON

SWORN TO and SUBSCRIBED before me this 29 day of August 2002 by
ERIC CHARLSON, HR Dir. for HYATT CORPORATION, who is personally known
to me or has produced _____ as identification.




NOTARY PUBLIC, STATE OF ILLINOIS